

REMARKS

Claims 1-20, 22-26 and 30 are currently pending in the subject application and are presently under consideration. Claims 1, 16, 22, 26 and 30 have been amended as shown on pages 2-8 of the Reply.

Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

I. Rejection of Claims 1-15 Under 35 U.S.C. §101

Claims 1-15 stand rejected under 35 U.S.C. §101 because the claimed invention is directed to non-statutory subject matter. Claim 1 has been amended herein. In view of the amendments, this rejection is now moot and should be withdrawn.

II. Rejection of Claims 1-5, 13, 16-18 and 30 Under 35 U.S.C. §103(a)

Claims 1-5, 13, 16-18 and 30 stand rejected under 35 U.S.C. §103(a) as being obvious over Wu *et al.* (US 5,774,551) in view of Lafer *et al.* (US 6,192,382). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.* and Lafer *et al.*, alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicants' disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

Applicants' claimed invention relates to a system and method that simplifies writing a program that will respond to challenges from various authentication systems. The system provides for treating various authentication systems in a generic manner so that it does not require recompiling and recoding of an application to interact with different authentication

systems. In particular, amended independent claim 1 recites *a learning component that determines anticipated authentication challenges to resource requests from applications based on responses generated during previous resource requests by application; an authentication manager that receives first data associated with the communication challenge and processes the first data into second data of a first type appropriate for a first authentication module, the authentication manager communicates the second data to an appropriate authentication module, the authentication manager further communicates the second data to the at least one different authentication module if the first module is unable to process the authentication challenge, the authentication manager also generates pseudo-challenges on its own and communicates data to at least one authentication module.* Independent claims 16 recites *pre-authenticating the resource request by generating and storing an authentication response to the anticipated authentication challenge; generating a pseudo-challenge and storing a response to the pseudo-challenge,.... producing one or more responses to the authentication challenge.* Independent claim 30 recites similar features. The cited references are silent about such novel features of the subject claims.

Wu *et al.* teaches an application programming interface that mediates between the system entry services and the account management services on a computer. At page 5 of the Office Action, the Examiner contends that Wu *et al.* teaches such novel features of applicants' claimed invention. Applicants' representative avers to the contrary. In accordance with the subject invention, the system registers two or more authentication modules with the authentication manager, where the authentication modules receive data associated with an authentication challenge and produce a response to the challenge. The authentication manager accepts an authentication challenge from a resource request and passes on the challenge to an appropriate authentication module and if the module is unable to process the challenge, the manager passes it on to subsequent modules until one of the modules processes the challenge. The authentication manager may also generate pseudo-challenges and pass data to the authentication modules. Pre-authentication challenge test messages are also processed by the authentication modules. The responses generated by the authentication modules are stored in a cache. The authentication manager can then retrieve responses from the cache to respond to the authentication challenge, pseudo-challenge or the test message, as desired. At the cited portions, Wu *et al.* discloses a multi authentication system with a pluggable account management service that authenticates a

user on two authentication services. The challenges are different and only if both are successful the user is allowed access. In contrast, the system taught by the claimed invention allows the first authentication module to process the challenge, if the module is unable to process it, the same challenge is passed on to the subsequent modules until the challenge is processed. Storing responses in the cache in response to a pseudo-challenge can reduce the time to respond to an actual authentication challenge. By generating one or more pre-authentication and pseudo-challenge responses and storing them in the cache, response time can be improved because a response to an actual authentication challenge can be pulled from the cache, rather than having to be generated. Hence, Wu *et al.* is silent regarding anticipating an authentication challenge or generating pseudo challenges as recited by the subject claims.

Lafer *et al.* teaches a system for web page construction and distribution in which personalization of individual pages is done, by locating a tag cache in a server and embedding associated tags into stored pages and does not compensate for the aforementioned deficiencies of Wu *et al.*

In view of the above, Wu *et al.* and Lafer *et al.*, alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 16 and 30 (and the claims that depend from) and thus fail to make obvious or suggest the subject claims. Therefore, it is requested that this rejection should be withdrawn.

III. Rejection of Claims 6-7, 22-23 and 26 Under 35 U.S.C. §103(a)

Claims 6-7, 22-23 and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* in view of Lafer *et al.* and further in view of Travis *et al.* (US 6,269,367). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.* Lafer *et al.* and Travis *et al.* alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

Amended independent claims 1, 22 and 26 recite similar features, namely *the authentication manager communicates the second data to an appropriate authentication module, the authentication manager further communicates the second data to the at least one different authentication module if the first module is unable to process the authentication challenge, the authentication manager also generates pseudo-challenges on its own and communicates data to at least one authentication module and pre-authenticating the resource*

request by generating and storing an authentication response to the anticipated authentication challenge; generating a pseudo-challenge and storing a response to the pseudo-challenge,..... producing one or more responses to the authentication challenge and/or pseudo-challenge.

As discussed *supra*, Wu *et al.* and Lafer *et al.* do not teach all aspects of the subject claims. Travis *et al.* does not compensate for the aforementioned deficiencies. Travis *et al.* teaches a system for identifying code fragments in a program and correcting the code fragments. At the cited portion Travis *et al.* discloses testing of code fragments to expose hidden problem in the code. In contrast, the system of applicants' claimed invention processes a pre-authentication challenge test message, stores the result of the message in a cache and employs the stored result to facilitate producing a response to one or more authentication challenges produced by one or more authentication systems. Thus, Travis *et al.* is silent regarding the aforementioned deficiencies of Wu *et al.* and Lafer *et al.*

In view of the above, Wu *et al.*, Lafer *et al.* and Travis *et al.* alone or in combination, fail to teach or suggest all limitations of applicants' invention as recited in independent claims 1, 22 and 26 (and the claims that depend from). Therefore, it is requested that this rejection should be withdrawn

IV. Rejection of Claims 8-12, 14-15, 19-20 and 24-25 Under 35 U.S.C. §103(a)

Claims 8-12, 14-15, 19-20 and 24-25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Wu *et al.* in view of Lafer *et al.* and Travis *et al.* and in further view of Object Oriented Programming as illustrated by Burroughs *et al.* (US 5,878,411), Kumar *et al.* (US 6,343,287), Microsoft Press (Microsoft Press, "Computer Dictionary, 3rd edition, ISBN: 157231446X, 1997) and New Rider (New Rider, "Windows 98 Professional Reference", <http://cma.zdnet.com/book/win98prfref/ch15/ch15.htm>). It is respectfully submitted that this rejection should be withdrawn for at least the following reasons. Wu *et al.*, Lafer *et al.*, Travis *et al.*, Burroughs *et al.*, Kumar *et al.*, Microsoft Press and New Rider alone or in combination, do not teach or suggest each and every limitation of applicants' claimed invention.

Claims 8-12, 14-15, 19-20, and 24-25 depend from independent claims 1, 16 and 22. As noted *supra*, Wu *et al.*, Lafer *et al.* and Travis *et al.* does not teach or suggest each and every element of the subject invention as recited in these independent claims and Burroughs *et al.*, Kumar *et al.*, Microsoft Press and New Rider fails to make up for the deficiencies with regard to

these independent claims. Accordingly, it is respectfully requested that this rejection be withdrawn.

CONCLUSION

The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063 [MSFTP202US].

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicants' undersigned representative at the telephone number below.

Respectfully submitted,

AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/

Himanshu S. Amin

Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP
24TH Floor, National City Center
1900 E. 9TH Street
Cleveland, Ohio 44114
Telephone (216) 696-8730
Facsimile (216) 696-8731